

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
~~GULFPORT~~ DIVISION
Southern

IN RE: *EX PARTE* APPLICATION OF) CASE NO.:
LAURA ZÚNIGA CÁCERES, BERTHA)
ZÚNIGA CÁCERES, AND SALVADOR)
ZÚNIGA CÁCERES FOR ASSISTANCE)
BEFORE A FOREIGN TRIBUNAL)
_____)

**[PROPOSED] ORDER GRANTING *EX PARTE* APPLICATION OF LAURA ZÚNIGA
CÁCERES, BERTHA ZÚNIGA CÁCERES, AND SALVADOR ZÚNIGA CÁCERES
FOR DISCOVERY FOR USE IN A FOREIGN TRIBUNAL
PURSUANT TO 28 U.S.C. § 1782**

Pending before the Court is the *Ex Parte* Application of Laura Zúniga Cáceres, Bertha Zúniga Cáceres, and Salvador Zúniga Cáceres (together, “Applicants”) for Discovery for Use in a Foreign Tribunal Pursuant to 28 U.S.C. § 1782 (the “Application”).

The Court finds that the statutory requirements of 28 U.S.C. § 1782 are met and that the discretionary factors set forth in *Intel Corp. v. Advanced Micro Devices, Inc.*, 542 U.S. 241, 264-66 (2004) favor granting the Application. Therefore, the Application is hereby GRANTED.

1. Applicants are hereby authorized to immediately issue to the Custodian of Records at Hancock Whitney Bank, a subpoena directing Hancock Whitney Bank to produce documents as identified in Schedule A hereto within fourteen (14) calendar days following service of the subpoena.

IT IS SO ORDERED.

Dated: _____

UNITED STATES DISTRICT JUDGE

Schedule A

DEFINITIONS

1. The term “Document” is used in its customary and broadest sense, and is synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Fed. R. Civ. P. 34(a)(1)(A). A draft or non-identical copy is a separate document within the meaning of this term.

2. The term “Financing Documents” means all Documents related to the mortgage or any other financing agreement entered into between You and Roberto D. Castillo and/or Tanya J. Romero Baca for the Property. This includes, but is not limited to, the mortgage or financing application, all information submitted in support of the mortgage or financing application, all Documents assessing the mortgage or financing application, all correspondence between You and Roberto D. Castillo and/or Tanya J. Romero Baca or their representatives related to the financing or mortgage and/or related to the Property, all information about the source of funds used for the down payment on the Property, and the Escrow file related to the Property.

3. The term “Property” means the property located at 3735 Jardin St., Houston, Texas 77055.

4. The terms “related to” or “relate to” mean relating to, concerning, referring to, evidencing, memorializing, constituting requests for Documents “related to” any subject matter listed in the request below, including Documents related to communications regarding that subject matter.

5. The term “Relevant Time Period” means January 1, 2016 to the present.

6. The terms “You” and “Your” mean Hancock Whitney Bank and its predecessors, successors, parents, subsidiaries, departments, divisions, joint ventures, affiliates, officers,

directors, agents, employees, attorneys, consultants and any other person or entity acting on its behalf.

7. The terms “all,” “any,” and “each” shall each be construed as encompassing any and all.

8. The connectives “and” and “or” shall be construed conjunctively or disjunctively as necessary to bring within the Request all information which might otherwise be construed as outside its scope.

9. All references to the singular include the plural; and, all references to the plural include the singular.

INSTRUCTIONS

A. All responsive non-privileged Documents in Your possession, custody, or control are to be produced. If, after exercising due diligence to secure the Documents requested, You cannot produce all responsive Documents, so state, produce to the extent possible, specify the reasons why You were unable to provide a full and complete response, and state what information and knowledge you do have concerning the unproduced portion.

B. If You decline to produce any Document or part thereof based on a claim of privilege or any other claim, please provide a privilege log that, for each such Document, states: (a) the subject matter of the withheld Document; (b) the nature of the Document (letter, memorandum, notes, etc.); (c) the Bates number of the withheld Document; (d) its date; (e) its author(s); (f) its recipient(s), if any (To / CC / BCC fields); (g) the privilege(s) claimed; (h) a description of the privilege(s) so as to explain the basis asserted for withholding the Document in sufficient detail so as to enable the claim of privilege to be adjudicated, if necessary; and (i) whether the Document has been redacted.

REQUESTS

1. All Documents from the Relevant Time Period related to the Property, including all Financing Documents.